

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**HEATHER KIERNAN,
Plaintiff,**

v.

**ARMORED MOTOR SERVICES OF
AMERICA, INC. and FRANCISCO
CIAMBRIELLO,
Defendants.**

Civil Action No. 10131

**JOINT MOTION TO EXTENSION OF DEADLINE FOR FILING OPPOSITIONS
TO PENDING DISPOSITIVE MOTIONS**

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiff Heather Kiernan (“Kiernan”) and Defendant Armored Motor Services of America, Inc. (“AMSA”) hereby move for an extension of time, through and including March 7, 2006, for filing their Oppositions to Pending Motions. The grounds for this motion are as follows:

1. Pursuant to the Court’s December 22, 2005 Scheduling Order, Plaintiff was required to file her motion for sanctions due to alleged spoliation of evidence and Defendant AMSA was required to file its motion for summary judgment on or by February 10, 2006 with oppositions due on March 24, 2006 and reply memoranda (not to exceed seven (7) pages) due on March 3, 2006.

2. Due to commitment on other matters and workload, counsel for Plaintiff and Defendant AMSA have insufficient time before March 7, 2006 to prepare their respective oppositions.

WHEREFORE, the parties respectfully request an extension of time, through and including March 7, 2006 to file their respective oppositions and through and including March 14, 2006 to file any reply memoranda.

Respectfully submitted,

HEATHER KIERNAN,

ARMORED MOTOR SERVICES
OF AMERICA, INC.,

By her attorney

By its attorneys,

/s/ William J. McLeod
William J. McLeod
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 21, 2006.

/s/ Allison K. Romantz
Allison K. Romantz